

I believe that the timing for DRVSM implementation needs to be reconsidered and delayed in light of the current state of the airline industry with it's diminished number of flights and thus reduced traffic volume at all altitudes, including FL290 and above.

I also believe that DRVSM should be eventually implimented from FL350 and above only, thus permitting older aircraft to continue operating at their most efficient altitudes, without the necessity of expensive upgrades. Alternatly, I propose that aircraft with one DRVSM approved altimeter, a second conventional altimeter plus TCAS should be permitted to operate up to FL350 without a second DRVSM altimeter. This would greatly reduce the cost of equipment upgrades for many aircraft seeking to fly above FL290.